Submission received by email: Trans Tasman energy group, 22/04/2014

We are intending to provide more detailed submissions to the Victorian Distribution 2016-20 Framework and Approach from both Trans Tasman Energy Group plus the Streetlight Group of councils (on confirmation).

We would appreciate if the AER could provide an extension until Thursday 24th April to enable these more detailed submissions.

In the meantime, to assist the AER in its process, we have summarized key points our more detailed submission below.

Our submission pertains solely to the provision of public lighting services, and we submit to the AER:

1. It is desirable to amend or replace the current Victorian Framework and approach papers as they are no longer appropriate for public lighting services. Indeed (in our view) the current narrow description of services and classification of that service as Alternative Controlled is prohibiting competition.
2. Public lighting services need to be more clearly defined to enable the introduction of a tiered tariff system for public lighting as applies in all other NEM jurisdictions. The tiered system should address who funds and maintains the public lighting asset. In SA there is a Full SLUoS tariff, a CLER tariff and Energy Only tariff. Further each of these services has been classified as a Negotiated Distribution service.
3. There are no natural monopoly characteristics regarding the supply and maintenance of public lighting. Indeed distributors engage sub contractors –so there is a competitive market. As such public lighting services (including Type 7 metering) should be classified as Negotiated or Contestable.
4. In the current determination the AER classified “new light types” as Negotiated. Recognising the rapid emerging technologies and options for end users the opportunity provided by tiered pricing (above) provides and users with greater choice.
5. We recognise distributors currently own many of the lights but end users have the ability under the Negotiated classification to establish both service and price with the distributor.

We trust the above insights will assist the AER in its considerations and that the AER will provide stakeholders with the opportunity to participate in a review of the Framework and Approach for Victorian Distributors.

Yours sincerely**,**

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